



1934 Old Gallows Rd. Suite 350  
Tysons Corner, VA 22182  
[www.razmobility.com](http://www.razmobility.com)

December 7, 2017

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W., Rm TW-A325  
Washington, DC 20554

Re: *Ex Parte Meeting*: Misuse of Internet Protocol Captioned Telephone Service (IP CTS) and Speech-to-Speech for Individuals with Hearing and Speech Disabilities, CG Docket Numbers 13-24, 03-123.

Dear Ms. Dortch:

On December 6, 2017, Robert Felgar, Nermin Selimic and Klaus Schafer of RAZ Mobility, LLC ("RAZ"), and Tomer Shor of TuneFork, met with Karen Peltz Strauss (CGB), Eliot Greenwald (CGB and DRO) and Michael Scott (CGB and DRO). David Schmidt (OMD) participated by conference bridge.

RAZ and TuneFork discussed a new Android-based solution under development that allows a person to take a hearing test on a smartphone. The results of the hearing test are then used to personalize the smartphone audio to significantly improve the user's listening experience. RAZ and TuneFork explained that this could help many individuals who are hard of hearing place and answer calls with a mobile device without the assistance of IP CTS. TuneFork's solution is further explained in the attached presentation.

RAZ and TuneFork will test the solution in a trial conducted with the assistance of the Virginia Department of the Deaf and Hard of Hearing. RAZ aims to eventually make the solution available to state equipment distribution programs.

RAZ suggested that if the state equipment distribution programs assume a heightened role in determining users' eligibility for IP CTS equipment and relay service, that these state programs should be required to educate consumers regarding alternatives to IP CTS, such as TuneFork's solution. Doing so would enhance consumer choice and materially reduce the size of the Telecommunications Relay Service Fund ("TRS Fund").

RAZ also requested that the Commission establish an "Innovation Fund" of up to \$500,000 per year, for three years. The money would be used to fund trials of promising new solutions that are alternatives to relay service and that have the potential to save the TRS Fund substantial sums of money. Trials would be conducted in partnership with state or local government agencies. An Innovation Fund would speed the development and widespread adoption of new solutions to the benefit of consumers who are deaf or hard of hearing, as well as rate payers who support the TRS Fund. An Innovation Fund is needed because the market is

inefficient due to the fact that Relay service is subsidized (i.e., alternatives to relay service – such as TuneFork -- are competing with a service that is free). In addition, private investors are not motivated to invest in solutions in order to lower the expense of the TRS Fund, since cost reductions to the TRS Fund do not deliver economic returns to private investors.

RAZ Mobility and TuneFork greatly appreciates the opportunity to contribute to this important proceeding.

Sincerely,

Robert Felgar, CEO

cc: Karen Peltz Strauss  
Eliot Greenwald  
Michael Scott  
David Schmidt